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Exhibit A
Omnibus Claim Objection Notice

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and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**THE OBJECTION DESCRIBED IN
THIS NOTICE ASKS THE COURT
TO DISALLOW AND EXPUNGE
YOUR CLAIM(S) IDENTIFIED ON
THE FOLLOWING PAGE OF THIS
NOTICE.**

**CLAIMANTS RECEIVING THIS
NOTICE SHOULD READ THIS
NOTICE CAREFULLY BECAUSE
THE OBJECTION MAY AFFECT
YOUR RIGHT TO RECEIVE A
DISTRIBUTION ON YOUR CLAIM
IN THIS CASE.**

**IF YOU HAVE QUESTIONS,
PLEASE CONTACT PRIME
CLERK, LLC, AT []**

**THE LAST PARAGRAPH OF THIS
NOTICE EXPLAINS HOW YOU
CAN OBTAIN A COMPLETE
COPY OF THE OBJECTION, AT
NO COST TO YOU.**

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF THE DEBTORS' [ORDINAL]
OMNIBUS OBJECTION TO CLAIMS**

Response Deadline:

Hearing Information If Timely Response Made:

Date:

Time:

[Claimant Name]

Filed					Basis for Objection	Proposed			Surviving	
Date	Claim #	Debtor	Classification	Amount		Debtor	Classification	Amount	Claim #	Amount

On [date], PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their [Ordinal] *Omnibus Objection to Claims* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). [A full copy of the Omnibus Objection may be obtained at no cost, as provided below.]

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Debtors’ Counsel by [date that is 14 days before hearing date] (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. [See Bankruptcy Local Rule 3007-1.]

If you file and serve a timely Response, the date, location and time of the Hearing are:

[date and time]

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated March 30, 2020, **the Hearing will be conducted telephonically or by video conference. The courtroom will be closed.** All parties who wish to appear at the Hearing should refer to the Bankruptcy Court’s website [link] for current information about how to appear. Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.

BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM: By the Omnibus Objection, the Debtors seek to disallow or reduce one or more of your Proof(s) of Claim (as defined therein) listed above on the grounds that the Proof(s) of Claim is/are:

[state grounds for objection].

If you do **NOT** oppose the disallowance or reduction of your Proof(s) of Claim listed above, then you do NOT need to file a written Response to this Omnibus Objection and you do NOT need to appear at the Hearing.

FILING AND SERVICE OF RESPONSE: If you **DO** oppose the disallowance or reduction of your Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in writing, with the Bankruptcy Court, and serve it on the counsel for the Debtors at the above-referenced email addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on [•], 2020 (the “Response Deadline”)**: You must file the Response through the Court’s electronic case filing (“ECF”) system if you have access to the ECF system; service on Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of your Response is required. If you do NOT have access to the ECF system, service must be made by electronic mail to the email addresses of the Debtors’ counsel as shown on the Objection, and you must arrange for the Response to be filed with the Court within two business days thereafter. If you do not have the ability to serve a Response electronically, the Response must be served by mail, express or some other means so either (a) it is actually received by Debtors’ Counsel by the Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or commercial express service that will make actual delivery not more than two business days after the Response Deadline, and in that case the Claimant must inform Debtors’ counsel by email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number, the number of the Omnibus Objection, and the fact that a paper Response is being delivered by express.

CONTENTS OF RESPONSE The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (v) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Debtors should serve a reply to the Response, if any; and (vi) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

If the Bankruptcy Court does not disallow or reduce your Proof(s) of Claim listed above, then the Debtors have the right to object on other grounds to your Proof(s) of Claim at a later date. You will receive a separate notice of any such objection.

TO GET COPIES OF THE COMPLETE OBJECTION: Copies of the complete Omnibus Objection and the other pleadings and documents identified herein can be viewed and/or obtained: (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account required], (ii) for free by download from on the Debtors’ approved notice and claim agent’s website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free, by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to request a complete copy of the Omnibus Objection, including all Exhibits.

Dated: [•], 2020

**WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP**

/s/
Peter J. Benvenutti
Attorneys for Debtors and Debtors in Possession